

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

HO WAN KWOK,

Defendant.

Case No. 1:23-CR-118-1 (AT)

**REPLY DECLARATION OF
SIDHARDHA KAMARAJU
ACCOMPANYING DEFENDANT'S
REPLY IN RESPONSE TO THE
TRUSTEE'S, UCC'S AND SHERRY'S
OPPOSITION AND IN FURTHER
SUPPORT OF DEFENDANT'S
MOTION TO STAY**

I, SIDHARDHA KAMARAJU, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at the law firm Pryor Cashman LLP and counsel for Defendant Ho Wan Kwok in the above-captioned matter. I submit this declaration upon my personal knowledge in support of Defendant's Reply in Response to the Trustee's, UCC's and Sherry's Opposition and in Further Support of Defendant's Motion to Stay.

2. A true and correct copy of the Emergency Motion to Enjoin Debtor's Prosecution of Motion in Criminal Case for Order Staying Chapter 11 Cases and Associated Adversary Proceedings filed by Chapter 11 Trustee Luc A. Despins, Esq. on September 1, 2023 in the bankruptcy cases captioned *In re Ho Wan Kwok, et al.*, Case No. 22-50073(JAM) (Bankr. D. Conn.) (Jointly Administered) (the "Bankruptcy Cases"), is attached hereto as **Exhibit 1**.

3. A true and correct copy of excerpts from the transcript of a September 12, 2023 hearing in the Bankruptcy Cases is attached hereto as **Exhibit 2**.

4. A true and correct copy of excerpts from the transcript of an August 29, 2023 hearing in the adversary proceeding in the Bankruptcy Cases captioned *Despins v. Taurus Fund LLC et al.*, Adv. Proc. No. 24-05017(JAM) (Bank. R. Conn.), is attached hereto as **Exhibit 3**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 5, 2023.



Sidhardha Kamaraju
Counsel for Defendant
Ho Wan Kwok